

DEPT. OF TRANSPORTATION  
DOT/TS

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Docket # TSA-2008-0021

02/05/2009

To Whom It May Concern:

As the owner of an aircraft that weighs over 12,500 lbs. I wish to comment on the proposed new Large Aircraft Security Plan. Our aircraft is a business tool utilized for the maintenance and growth of our business holdings. The aircraft carries our personnel to various airports across the country that otherwise would not be accessible by commercial carrier. Utilizing our own aircraft allows our executives to conduct meetings in private, carry manufactured samples, and remain in touch with our home office while traveling to these remote locations. All of the above cannot be done on a commercial carrier.

This new proposed security plan would have no effect on increasing safety within our organization or safety in general. The flight department already conducts safety procedures and briefing of our personnel as well as securing the aircraft while it is parked, whether we are at Atlanta Hartsfield or Pella, IA. Conversely, this plan would place an undo economic hardship on our organization if we are forced to comply with this new rule. It would likely have us re consider the continued ownership of the company plane. Talking with other companies that have the same type aircraft, that utilize their aircraft much the same way, they have expressed the same opinion to me. If we cease aircraft operations, then others follow, this would be an economic disaster for business aviation in the United States. Reason being, the new ineffective security rule removes every travel advantage that the business aircraft has over commercial air travel without increasing safety. If there is no advantage, no need for an aircraft. This would affect not only aircraft owners, but all operations related to aircraft support, i. e. ,fuel sales, maintenance, aircraft mfg. etc.

I therefore urge the parties that will debate this issue to re consider this rule, shelve the item entirely or at least adopt the recommendations of the NBAA as it applies to this proposed new rule.

Respectfully,

Terry Boffeli  
Vice President - Finance